1	WILLIAM F. SULLIVAN (SB# 78353)	
2	williamsullivan@paulhastings.com JOHN S. DURRANT (SB# 217345)	
3	johndurrant@paulhastings.com KATHRYN C. WANNER (SB# 269310)	
4	kathrynwanner@paulhastings.com PAUL, HASTINGS, JANOFSKY & WALKER LLP 515 South Flower Street	
5	Twenty-Fifth Floor	
6	Los Angeles, CA 90071-2228 Telephone: (213) 683-6000 Facsimile: (213) 627-0705	
7	Attorneys for Defendants	
8	The Bear Stearns Companies LLC; J.P. Morgan Securities LLC; and J.P. Morgan Clearing Corp.	
9		8 - 0.1 P.
10	UNITED STATES DISTRICT COURT	
11	CENTRAL DISTRICT OF CALIFORNIA	
12		
13	Vivine H. Wang,	CASE NO. CV11-02624 PSG (SSx)
14	Plaintiff,	[PROPOSED] ORDER GRANTING DEFENDANTS' EX PARTE
15	VS.	APPLICATION FOR A STAY AND AN EXTENSION OF TIME TO
16 17	The Bear Stearns Companies LLC (formerly known as The Bear Stearns	RESPOND TO THE COMPLAINT
18	Companies, Inc.); J.P. Morgan Securities LLC (formerly known as	[Ex Parte Application and Declaration
19	Bear, Stearns & Co., Inc.); J.P. Morgan Clearing Corp. (formerly known as	of J. Durrant filed and served concurrently herewith]
20	Bear, Stearns Securities Corp.); Deloitte & Touche LLP; Alan D.	Judge: Hon. Philip S. Gutierrez
21	Schwartz; Alan C. Greenberg; Joey Zhou; Garrett Bland,	Dept. 880 Complaint Served : April 4, 2011
22	Defendants.	Current Response Date: April 25, 2011 New Response Date: TBD
23		
24		Trial Date: TBD
25		
26		
27		
28		
		[PROPOSED] ORDER GRANTING

[PROPOSED] ORDER GRANTING APPLICATION FOR A STAY AND EXTENSION OF TIME

1 [PROPOSED] ORDER 2 3 WHEREAS the United States Judicial Panel on Multidistrict Litigation 4 ("MDL Panel") issued a Conditional Transfer Order ("CTO") on April 11, 2011 5 transferring this matter to the United States District Court for the Southern District 6 of New York for coordinated or consolidated proceedings with *In re: The Bear* 7 Stearns Companies Inc. Securities, Derivative and Employee Retirement Income 8 Security Act (ERISA) Litigation, MDL No. 1963 (the "Bear Stearns MDL" 9 Litigation").; 10 11 WHEREAS, on April 18, 2011 plaintiff Vivine H. Wang ("Plaintiff") 12 filed a notice of opposition to the CTO with the Clerk of the MDL Panel, and 13 Plaintiff's motion to vacate the CTO and brief in support thereof are due on May 2, 14 2011, and the defendants' response is due on May 24, 2011; 15 16 WHEREAS, Defendants have applied ex parte for a stay of 17 proceedings pending the final resolution of the CTO, and for an extension of time 18 to answer or otherwise respond to the Complaint of thirty (30) days after the final 19 resolution of the CTO; 20 21 WHEREAS, good cause exists to stay this action until such time as the 22 Plaintiff's opposition to the CTO is resolved; 23 24 WHEREAS, good cause exists to grant defendants The Bear Stearns 25 Companies LLC, J.P. Morgan Securities LLC, J.P. Morgan Clearing Corp., and Deloitte & Touche ("Defendants") thirty (30) days after a final determination of the 26 27 CTO in which to answer or otherwise respond to the Complaint; 28 [PROPOSED] ORDER GRANTING